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Attorneys for Defendants  
THE GEO GROUP, INC., CAMPOS, and DIAZ

UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA

OMAR ARNOLDO RIVERA  
MARTINEZ; ISAAC ANTONIO  
LOPEZ CASTILLO; JOSUE  
VLADIMIR CORTEZ DIAZ; JOSUE  
MATEO LEMUS CAMPOS;  
MARVIN JOSUE GRANDE  
RODRIGUEZ; ALEXANDER  
ANTONIO BURGOS MEJIA; LUIS  
PENA GARCIA; JULIO CESAR  
BARAHONA CORNEJO, as  
individuals,

Plaintiffs,

v.

THE GEO GROUP, Inc., a Florida  
corporation; GEO LIEUTENANT  
DIAZ, sued in her individual capacity;  
GEO SERGEANT CAMPOS, sued in  
his individual capacity;;

Defendants.

Case No. 5:18-cv-01125-SP

**DEFENDANTS' OBJECTIONS TO  
PLAINTIFFS' WITNESSES**

Pretrial Conference

Date: January 21, 2020

Time: 10:00 a.m.

Trial date: February 3, 2020

Time: 9:00 a.m.

Magistrate

Judge:

Honorable Sheri Pym

Defendants THE GEO GROUP, INC., CAMPOS, and DIAZ object to  
certain of Plaintiffs' witnesses, as set forth below.

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1           1.     Expert Dr. Homer Venters

2           Defendants object to Dr. Venters' testimony as set forth in their motion in  
3     limine #4, particularly because it is cumulative to Plaintiffs' force expert Schwartz.  
4     As a doctor, Venters also lacks foundation to testify about the reasonableness of the  
5     force used and alternatives to use of force.

6           2.     Attorney Witnesses

7           Defendants object to immigration attorneys of the Plaintiffs being called as  
8     witnesses, since they cannot be cross-examined about any discussions with  
9     Plaintiffs. This includes Hussain Turk, Mark Kleiman, Joseph McKeever, Nicole  
10    Ramos, Monalisa Tuitahi, and Kimberly Carver.

11          If this Court is inclined to let them testify, despite the privileges barring any  
12    thorough cross-examination, Defendants request an offer of proof as to the  
13    anticipated scope of testimony of these witnesses.

14          3.     Undisclosed Witnesses

15          Defendants object to previously unidentified and undisclosed witnesses  
16    testifying at trial. Michael Kaufman was not disclosed in Plaintiffs' Rule 26  
17    disclosures and has not been identified, to defense counsel's knowledge, during this  
18    litigation. Therefore, this witness should be excluded.

19          Additionally, Hussain Turk was not identified in Plaintiffs' Rule 26  
20    Disclosures, and thus should not be permitted to testify.

21          4.     Plaintiffs Out of Country

22          Defendants object to Plaintiffs Isaac Castillo and Omar Martinez offering  
23    their testimony by way of deposition transcript at trial, given that they are out of the  
24    country. While they sought the Court's assistance in obtaining a letter to help get  
25    visas, it is Defendants' understanding they did not apply for and thus have not  
26    obtained visas to enter the country for trial. Defendants did not anticipate they  
27    would be unavailable for trial, and did not cross-examine them as such.

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1 Defendants do not object to videoconference or videolink (such as Skype or  
2 Zoom) testimony of these Plaintiffs, so that their testimony may be conducted live  
3 during trial.

4 Dated: January 14, 2020

BURKE, WILLIAMS & SORESENSEN, LLP

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By: /s/ Carmen M. Aguado

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Susan E. Coleman  
Carmen M. Aguado

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Attorneys for Defendants  
THE GEO GROUP, INC.,  
CAMPOS, and DIAZ

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